

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

CKB168 HOLDINGS LTD., ET AL.

Defendants,

- AND -

ROSANNA LS INC., ET AL.,

Relief Defendants.

**CASE NO.13-cv-5584 (RRM)
(RLM)**

**STIPULATION AND [PROPOSED] ORDER MODIFYING THE PRELIMINARY
INJUNCTION ENTERED AGAINST DEFENDANTS CHEONGWHA "HEYWOOD"
CHANG AND TONI TONG CHEN**

WHEREAS, the Court entered a October 9, 2013 Temporary Restraining Order as to all Defendants and Relief Defendants, freezing assets, enjoining them from destroying evidence, ordering an accounting and providing other emergency relief;

WHEREAS, the Court entered an Order on November 19, 2013 entering a preliminary injunction, asset freeze and other relief (the "Preliminary Injunction") as to defendants Toni Tong Chen ("Chen") and Cheongwha "Heywood" Chang ("Chang");

WHEREAS, the Preliminary Injunction permitted defendants Chen and Chang and Relief Defendants Arcadia and HTC to seek reasonable relief from the Preliminary Injunction;

WHEREAS, the Court entered an Order on December 4, 2013 modifying the terms of the Preliminary Injunction as to defendants Chen and Chang.

WHEREAS, the Court entered an Order on June 18, 2014, for a second modification on the terms of the Preliminary Injunction as to defendants Chen and Chang.

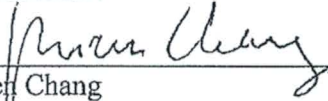
WHEREAS, Plaintiff Securities and Exchange Commission ("SEC") has agreed with defendants Chen and Chang regarding a third modification to the Preliminary Injunction;

NOW, THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED that the Preliminary Injunction is modified for the third time as follows:

- A. In addition to the amount of \$3,000 per month, defendants Chen and Chang shall be permitted to pay a total of \$20,000 in legal expenses for the months of August through November 2015 and in connection with their efforts to oppose the Motion for Summary Judgment served by the SEC;
- B. Defendants Chen and Chang shall be permitted to pay a total of \$12,199.93 in legal expenses owed to their attorneys, Cogswell Nakazawa & Chang, LLP for the months of October 2014 through June 2015; and
- C. Defendants Chen and Chang shall be permitted to borrow from defendant Chen's life insurance account at Western Reserve Life with the account number ending in -2800 for up to \$32,199.93, to make the payment to their attorneys, Cogswell Nakazawa & Chang, LLP or to deposit said sum in their East West Bank account with the account number ending in -1684.
Defendants Chen and Chang shall be permitted to access said East West Bank

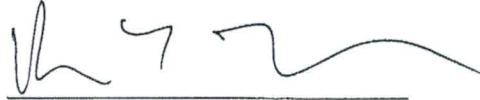
account to withdraw up to \$32,199.93 for their payment of attorneys' fees
owed to date and for the period August through November 30, 2015

SO AGREED:


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*Counsel for Defendants Toni Tong Chen
and Cheongwha Chang and Relief
Defendants Arcadia Business Consulting,
Inc. and HTC Consulting LLC*


Dated: August 18, 2015


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*Counsel for Plaintiff Securities and
Exchange Commission*

Dated: August 19, 2015

SO ORDERED:


Hon. Roslynn R. Mauskopf
United States District Judge

8/21/2015

CERTIFICATE OF SERVICE

I, the undersigned, certify that on August 19, 2015, a true and correct copy of the *foregoing* was filed with the Clerk of the Court and served on the below by ECF in accordance with the Federal Rules of Civil Procedure, and pursuant to email for *pro se* defendants:

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Defendants

and

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Defendants

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Ouni International Trading Inc.
EZ Stock Club Corp.
E Stock Club Corp.
USA Trade Group Inc

Relief Defendants

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/s/ Daniel J. Maher
Daniel J. Maher